

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

FILED

FEB 16 2016

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
BENTON OFFICE

UNITED STATES OF AMERICA,)

Plaintiff,)

vs.)

LAMARCUS DEVON JACKSON,)

Defendant.)

CRIMINAL NO. 15-CR-30016-SMY

STIPULATION OF FACTS

Comes now James L. Porter, Acting United States Attorney for the Southern District of Illinois, and Ali Summers, Assistant United States Attorney for said District, and herewith enters into the following Stipulation of Facts with the Defendant,

1. On December 11, 2014 at approximately 4:20 p.m., three black males wearing black ski masks entered the Alps grocery store located at 800 Upper Cahokia Road in Cahokia, Illinois armed with two hand guns and an assault rifle. The men pointed the firearms at the employees present and demanded money. The three men took cash from the registers and from the safe located within the office of the store.

2. The robbery was captured on the store video surveillance which shows that the first masked man to enter the store was armed with a black semi-automatic assault rifle; the second masked man was armed with a black handgun with an extended magazine protruding from the firearm; and the third masked man was armed with a black handgun.

3. The three men fled the store before the police arrived. In total, approximately \$1,700 in United States currency belonging to Alps grocery store was taken from the safe and registers.

4. On January 11, 2015, at approximately 9:42 p.m., four masked and armed black males entered the Shop 'n Save grocery store, located at 1028 Camp Jackson Road, Cahokia, Illinois, and pointed the firearms at employees and customers within the store and demanded money.

5. The robbery was captured on the store video surveillance. The video shows the first man to enter the store was wearing a dark hooded sweatshirt with the hood pulled over a black ski mask and was armed with a rifle with a wood stock, bayonet and high capacity magazine. The second man to enter was wearing a dark hooded jacket with white stripes down the sleeves, was carrying a black backpack, and was armed with a black semi-automatic handgun. The third man to enter was wearing a dark hooded sweatshirt with the hood pulled over a black ski mask and was armed with a large-framed silver revolver. The fourth man to enter was wearing a dark hooded sweatshirt with the hood pulled over a black ski mask and was armed with a silver colored semi-automatic handgun.

6. The second man to enter the store, wearing the black hooded jacket with white stripes down the sleeves, jumped over the counter of the customer service desk and demanded that employees open the safe located within the office while the other three men stood guard at the front of the store with their firearms. An employee filled the backpack with bundles of United States currency from the open safe, during which time the man also grabbed money from a register drawer. During the robbery, the fourth masked man, armed with the silver colored semi-automatic handgun, threatened to kill a customer if the employees did not comply with their demands. In total, approximately \$5,700 of United States currency belonging to Shop 'n Save was taken from the safe and register.

7. Through investigation, law enforcement agents identified the Defendant, Byron

Holton, Undray Webb, and Devante Hodges as the four gunmen responsible for the armed robbery of Shop 'n Save. Agents also determined that Durand Harper acted as the getaway driver for the Shop 'n Save robbery.

8. The Defendant was interviewed by law enforcement officers regarding his involvement in the armed robbery of the Alps grocery store and the armed robbery of Shop 'n Save. The Defendant was advised of his Miranda rights and his statements were audio and video recorded.

9. The Defendant admitted that on December 11, 2014, he committed the armed robbery of Alps grocery store with Byron Holton and Undray Webb. The Defendant stated that the three of them drove to Alps grocery store in his vehicle and parked behind the building. The Defendant admitted that all three of them were armed with firearms and that he was carrying a small .22 caliber rifle. The Defendant stated he was the first man to enter the Alps grocery store and that he took money from a safe inside the office while Holton took money from a register located near the office door. The Defendant further stated that Webb pointed his firearm at the checker and took money from the cash register in the middle of the store.

10. The Defendant also admitted that on January 11, 2015, he committed the armed robbery of Shop 'n Save with Byron Holton, Undray Webb, Devante Hodges and Durand Harper. The Defendant stated that all five of them met at Webb's house located in the St. Joseph housing subdivision in Cahokia, Illinois. While at Webb's residence, the Defendant, Holton, Webb, Hodges and Harper discussed their plan to rob the Shop 'n Save. The Defendant stated he, Holton, Webb and Hodges were all armed with firearms.

11. The Defendant admitted he, Holton, Webb and Hodges dressed themselves in dark, hooded jackets and ski masks to hide their identity. The Defendant stated they then walked with their firearms a short distance through an alley to the Shop 'n Save to commit the robbery.

12. Upon being shown the surveillance video of the robbery, the Defendant identified himself as the first individual to enter the Shop 'n Save carrying a rifle with a wood stock, bayonet and high capacity magazine. The Defendant identified Holton as the second individual to enter the store carrying a black semi-automatic handgun wearing the dark hooded jacket with white stripes down the sleeves who also jumped the counter; Hodges as the third individual to enter carrying a large-framed silver revolver; and Webb as the fourth individual to enter the Shop 'n Save carrying the silver semi-automatic handgun.


13. The Defendant further stated that after Holton was given the money from the safe by the employees, the four of them ran to Harper's vehicle which was parked near Webb's residence in the St. Joseph's subdivision. Harper then drove all of them to East St. Louis, Illinois where Holton gave each of them various amounts of money from the black backpack. The Defendant admitted he received approximately \$1000.00 in proceeds from the robbery.

14. Alps grocery store is located in Cahokia, Illinois, within the Southern District of Illinois, and was engaged in interstate commerce in that it was engaged in the retail sale of food and other grocery items. The robbery of Alps grocery store had a potential to affect, and did affect, interstate commerce in that the operating hours of the business were impacted and the assets of the business were depleted.

15. Shop 'n Save is located in Cahokia, Illinois, within the Southern District of Illinois, and was engaged in interstate commerce in that it was engaged in the retail sale of food, liquor and other grocery items. The robbery of Shop 'n Save had a potential to affect, and did

affect, interstate commerce in that the operating hours of the business were impacted and the assets of the business were depleted.


SO STIPULATED:


LAMARCUS DEVON JACKSON
Defendant


JAMES A. GOMRIC
Attorney for Defendant

Date: 2/16/16

JAMES L. PORTER
Acting United States Attorney


ALI SUMMERS
Assistant United States Attorney

Date: 2.16.16